

HEATHER E. WILLIAMS, SBN 122664
Federal Defender
HOOTAN BAIGMOHAMMADI, SBN 279105
Assistant Federal Defender
Designated Counsel for Service
801 I Street, Third Floor
Sacramento, CA 95814
T: (916) 498-5700
F: (916) 498-5710

Attorneys for Defendant
Mr. Correia

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:23-cr-00082-JAM
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) STATUS HEARING AND EXCLUDE TIME
AARON MICHAEL CORREIA,) Date: November 21, 2023
Defendant.) Time: 9:00 a.m.
) Judge: John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Haddy Abouzeid, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Aaron Correia, that the previously scheduled Status Hearing set for November 21, 2023 be continued to **February 13, 2024 at 9:00 a.m.**

The parties specifically stipulate as follows:

1. By previous order, the Status Hearing is currently scheduled for November 21, 2023 at 9:00 a.m. Time has been ordered excluded through that date.
2. Mr. Correia respectfully requests that the Court continue the Status Hearing to February 13, 2024 at 9:00 a.m.
3. The government has produced 101 pages and various audio recordings in discovery. Mr. Correia requires additional time to review the discovery;

investigate and research possible defenses; research potential pretrial motions; explore potential resolutions to the case; and otherwise prepare for trial.

4. Mr. Correia believes that failure to grant his motion would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5. The government does not object to Mr. Correia's motion.
6. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between November 21, 2023 and February 13, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Correia in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: November 15, 2023

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Correia

Date: November 15, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ Haddy Abouzeid
HADDY ABOUZEID
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: November 16, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE